

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Keith Jones, Individually and on Behalf	:	
of All Others Similarly Situated,	:	
	:	
and	:	
	:	Case No. 2:17-cv-1086
Nathan Andrews, Individually and on Behalf	:	2:19-cv-2514
of All Others Similarly Situated,	:	
	:	Judge Edmund A. Sargus Jr.
Plaintiffs,	:	
	:	Magistrate Judge Kimberly A. Jolson
v.	:	
	:	
Producers Service Corporation,	:	
	:	
Defendant.	:	

JOINT MOTION FOR EXTENSION OF TIME TO CONDUCT MEDIATION

Now come Plaintiffs and Defendant, by and through their respective counsel, and hereby jointly request that this Court extend the deadline to conduct mediation as set forth in its June 3, 2024, Order by 30 days to September 2, 2024. This stay is being requested as the consolidation of *Nathan Andrews v. Producers Serv. Corp.* (Case No. 2:19-cv-2514) necessitates the exchange of additional discovery. Because *Andrews* was stayed before the parties exchanged discovery, the process of exchanging and meaningfully reviewing relevant documents should take place before mediation can occur. To that end, limited discovery requests have since been exchanged but responses are not yet complete. Both parties agree it is necessary that said discovery, namely time and pay records for *Andrews* Plaintiffs, be exchanged in order to accomplish a complete resolution of this consolidated matter at mediation. Accordingly, the Parties respectfully request that they be afforded an additional 30 days to complete discovery and conduct mediation.

A proposed order is attached to this Motion.

Respectfully submitted,

/s/ Danielle M. Crane

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed and served via the Court's Electronic Filing System this 24th day of July, 2024:

/s/ Danielle M. Crane

Danielle M. Crane (0098994)